

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

INTERNATIONAL CONTROL SYSTEMS, §
LLC §

Plaintiff, §

vs. §

Civil Action No. 2:08-cv-188 TJW

SONY ELECTRONICS, INC.; §
PANASONIC CORPORATION OF §
NORTH AMERICA; PHILIPS §
ELECTRONICS NORTH AMERICA §
CORPORATION; TTE TECHNOLOGY, §
INC.; SHARP ELECTRONICS §
CORPORATION; JVC AMERICAS CORP; §
TOSHIBA AMERICA CONSUMER §
PRODUCTS, LLC; HITACHI HOME §
ELECTRONICS (AMERICA), INC.; §
MITSUBISHI DIGITAL ELECTRONICS §
AMERICA, INC.; SAMSUNG §
ELECTRONICS AMERICA, INC.; §
LG ELECTRONICS U.S.A, INC.; §
POLAROID CORPORATION; §
AUDIOVOX ELECTRONIX §
CORPORATION

Jury Trial Demanded

Defendants.

REPLY OF PLAINTIFF ICS TO DEFENDANT JVC AMERICA'S COUNTERCLAIM

Plaintiff International Control Systems, LLC ("ICS") files this reply to the counterclaim of Defendant JVC Americas Corp. ("JVC") set forth in JVC's Answer, Affirmative Defenses and Counterclaims in Response to Plaintiff's Amended Complaint for Patent Infringement ("the Answer and Counterclaim").

1. Paragraphs 1 through 36 of the Answer and Counterclaim set forth JVC's answer to ICS's First Amended Complaint; thus no response is required.

2. Paragraphs 37 through 48 of the Answer and Counterclaim set forth JVC's affirmative defenses; thus no response is required.

3. ICS responds to paragraph 49 of the Answer and Counterclaims by repeating and re-alleging its responses to paragraphs 1 through 48 of the Answer and Counterclaims, as though fully set forth herein.

4. The allegations in paragraph 50 of the Answer and Counterclaim are legal conclusions to which no response is required.

5. ICS admits the allegations in paragraph 51 of the Answer and Counterclaim.

6. ICS admits the allegations in paragraph 52 of the Answer and Counterclaim.

7. ICS admits the allegations in paragraph 53 of the Answer and Counterclaim.

8. The allegations in paragraph 54 of the Answer and Counterclaim are legal conclusions to which no response is required.

9. ICS admits the allegations in paragraph 55 of the Answer and Counterclaim.

10. ICS responds to paragraph 56 of the Answer and Counterclaims by repeating and re-alleging its responses to paragraphs 50 through 55 of the Answer and Counterclaims, as though fully set forth herein.

11. ICS denies the allegations in paragraph 57 of the Answer and Counterclaims.

12. ICS denies the allegations in paragraph 58 of the Answer and Counterclaims.

13. ICS denies the allegations in paragraph 59 of the Answer and Counterclaims.

14. ICS responds to paragraph 60 of the Answer and Counterclaims by repeating and re-alleging its responses to paragraphs 50 through 55 of the Answer and Counterclaims, as though fully set forth herein.

15. ICS denies the allegations in paragraph 61 of the Answer and Counterclaims.

16. ICS states that paragraphs a through h under the heading “Prayer for Relief” on page 11 of the Answer and Counterclaim contain only prayers for relief to which no responses are required. To the extent that these prayers for relief can be construed as containing factual allegations, ICS denies that JVC is entitled to any of the relief requested therein.

Respectfully submitted,

Date: January 8, 2009

/s/ Edward W. Goldstein_____
Edward W. Goldstein
Texas Bar No. 08099500
GOLDSTEIN, FAUCETT & PREBEG
L.L.P
1177 West Loop South, Suite 400
Houston, Texas 77027
(713) 877-1515 – Telephone
(713) 877-1737 – Facsimile
E-mail: egoldstein@gfpiplaw.com

ATTORNEY FOR PLAINTIFF

Of Counsel:

GOLDSTEIN, FAUCETT & PREBEG L.L.P
Christopher M. Faucett
Texas Bar No. 00795198
Michael J. Collins
Texas Bar No. 04614510
1177 West Loop South, Suite 400
Houston, Texas 77027
(713) 877-1515 – Telephone
(713) 877-1737 – Facsimile
E-mail: cfaucett@gfpiplaw.com
E-mail: mcollins@gfpiplaw.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on January 8, 2009. Any other counsel of record will be served by first class U.S. mail.

/s/ Edward W. Goldstein
Edward W. Goldstein